

May 29, 2025

**VIA ECF**

The Honorable Gary Stein  
United States Magistrate Judge  
500 Pearl Street, Courtroom 9A  
New York, NY 10007

Re: *United States v. Global Business Travel Group, Inc., et al.*, No. 1:25-cv-00215-VM

Dear Judge Stein:

In anticipation of a forthcoming motion to compel documents clawed back by Defendant Global Business Travel Group, Inc. (“GBT”) on the basis of privilege, the United States respectfully moves for leave from the three-page limit in Part III.B. of this Court’s Individual Practices in Civil Cases and respectfully requests three additional pages, for a total of six pages.

The parties have adhered to all requirements of the Stipulated Protective Order, ECF No. 38. Following three meet-and-confers that totaled more than two hours, the United States intends to move for reproduction of 20 documents clawed back by GBT on May 15, 2025. These documents are material to the deposition of a GBT employee that was scheduled for May 20, 2025, but now postponed due to GBT’s claw back.

The United States respectfully requests the three additional pages to adequately inform the Court of both the factual context for the dispute and legal arguments in support of the motion to compel. The additional pages will ensure that the Court is able to efficiently and effectively address the dispute.

Undersigned counsel has sought GBT’s position on this motion for leave twice over the past 29 hours. GBT has provided no response to these requests. The United States files this motion now because GBT’s counsel has repeatedly stated in meet-and-confers that it wishes to see this dispute resolved swiftly, an interest the United States shares. The United States respectfully requests that the Court grant this motion for leave by June 2, 2025, so that the claw-back issue can be briefed and resolved, and the postponed deposition can be rescheduled before the close of fact discovery on June 13, 2025. Additionally, Paragraph 55 of the Protective Order may prescribe June 2, 2025 as the United States’s deadline for challenging the clawed back documents. Should the Court be unable to address this motion for leave on or before June 2, 2025, the United States respectfully requests a brief extension to that deadline.

Respectfully submitted,

/s/ Michael Rosengart

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